

**FILED****4/11/2024****THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT**

UNITED STATES OF AMERICA

v.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISIONCASE NUMBER: 1:24-cr-00185  
**UNDER SEAL**

GLORIA KILGORE

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about April 4, 2024, at Lansing, in the Northern District of Illinois, Eastern Division, the defendant(s) violated:

*Code Section*

Title 18, United States Code, Section 2113(a)

*Offense Description*

by intimidation, took from the person and presence of a bank employee, United States currency belonging to and in the care, custody, control, management, and possession of Chase Bank, located at 16767 Torrence Avenue, Lansing, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

This criminal complaint is based upon these facts:

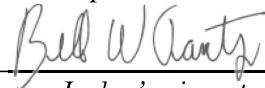
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DAVID FITZPATRICK  
SPECIAL AGENT, Federal Bureau of  
Investigation (FBI)

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: April 11, 2024

*Judge's signature*City and state: Chicago, IllinoisBeth W. Jantz, U.S. Magistrate Judge*Printed name and title*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

**AFFIDAVIT**

David Fitzpatrick, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since approximately November 2004. I am currently assigned to the FBI's violent crimes task force, and my responsibilities include the investigation of violent crimes, including bank robbery, kidnapping, violations of the Hobbes Act, federal carjacking violations, federal firearms violations, and the apprehension of violent fugitives.

2. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents who have knowledge of the events and circumstances described herein, law enforcement records, interviews of witnesses, my review of surveillance footage, my training and experience, and the training and experience of other law enforcement agents.

**I. FACTS SUPPORTING PROBABLE CAUSE TO SEARCH THE SUSPECT VEHICLE**

3. In summary, and as set forth in more detail below, on April 4, 2024, a black woman wearing a camouflage-patterned jacket, glasses, blue jeans, and black and white sneakers used a demand note to rob a Chase Bank located at 16767 Torrence Avenue in Lansing, Illinois ("the Chase Bank"). A bank teller at the Chase Bank complied with the demand note and provided the woman, who was not wearing a mask, approximately \$4,686 in cash. The bank teller, who saw the woman's face,

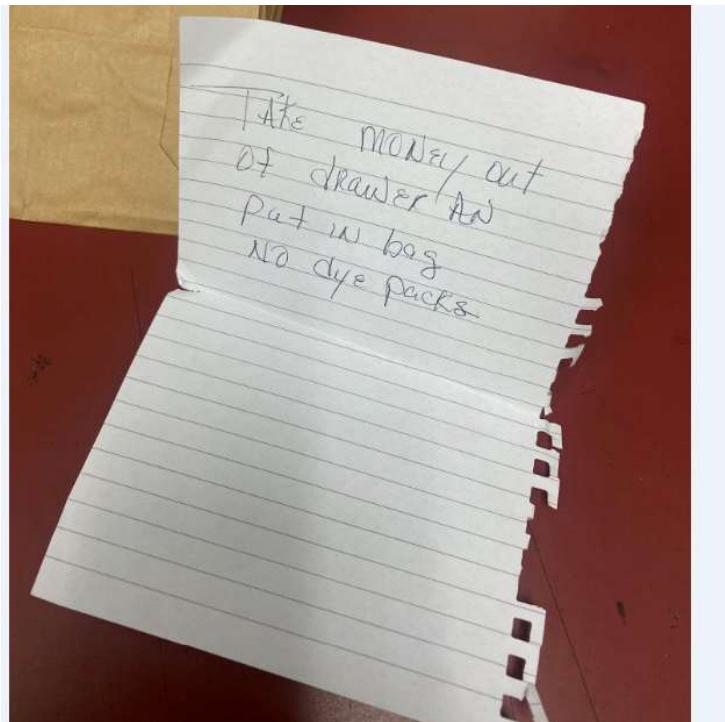
and a bank security guard, observed the woman enter a blue pickup truck and drive away. Shortly thereafter, law enforcement stopped GLORIA KILGORE (whose physical appearance and clothing matched the bank robber's) while she was driving a blue Chevrolet pickup truck (the "Suspect Vehicle") bearing distinctive similarities to the truck used in the robbery. Law enforcement arrested KILGORE. Nobody else was inside the Suspect Vehicle at the time of the arrest. A search of KILGORE's person incident to arrest did not recover the money taken during the robbery. However, law enforcement observed in plain view a bag sitting inside the Suspect Vehicle that appeared to be full. On April 10, 2024, a United States Magistrate Judge approved an application for a warrant to search the Suspect Vehicle. FBI is preparing to execute the search warrant on April 12, 2024.

**a. April 4, 2024, 11:05 a.m.: Robbery of the Chase Bank.**

4. On April 4, 2024, law enforcement responded to a report of a robbery at the Chase Bank located at 16767 Torrence Avenue in Lansing, Illinois ("the Chase Bank") and interviewed employees who worked at the Chase Bank.

5. According to Teller A (an employee at the Chase Bank) and video surveillance footage, on April 4, 2024, at approximately 11:04 a.m., a black female approached the Chase Bank. She was wearing a camouflage-patterned jacket with the fur-hood over her head, glasses, blue jeans, and black and white sneakers. She was not wearing a mask or gloves. According to the Chase Bank's security guard (Security Guard A), the woman first approached an ATM located in a vestibule near the entrance of the bank in an apparent attempt to feign a need for assistance.

Security Guard A approached the woman to ask if she needed assistance. The woman ignored Security Guard A, entered the bank, approached Teller A and handed Teller A a written note that stated, "Take money out of drawer and put in bag No dye packs." I retrieved a photograph of the demand note. This photograph is reproduced below.



6. According to Teller A, the woman was not wearing a mask and Teller A was able to look at the woman's face.

7. According to Teller A, the woman also spoke words to Teller A to the effect of "read the note, do what it says, don't tell anyone and take the money out of the top drawer."

8. According to Teller A, the woman told her to place money into a bag. Teller A responded that she did not have a bag. Video surveillance, as depicted below,

shows that the woman was carrying a small handbag (“Handbag 1”). The woman instructed Teller A to place money into Handbag 1.



9. According to Teller A, the woman claimed that her child had been kidnapped and taken hostage by a drug dealer and she needed money to pay the drug dealer who was holding her child hostage.

10. According to Teller A, Teller A proceeded to take money from the teller drawer until the woman told her to stop; the woman claimed that Teller A provided enough money so that the woman could pay the drug dealer who purportedly kidnapped her child.

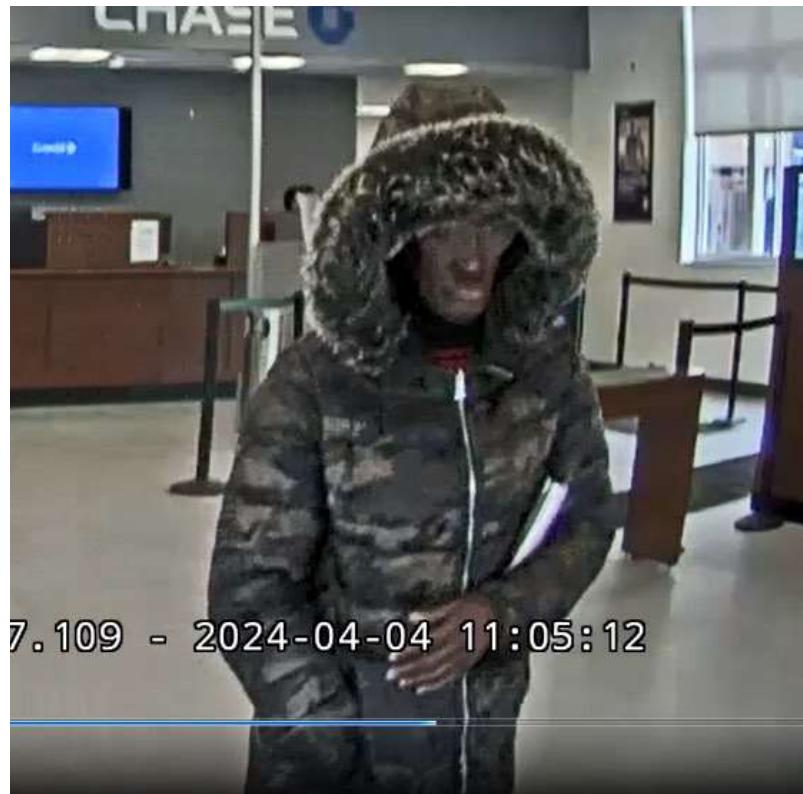
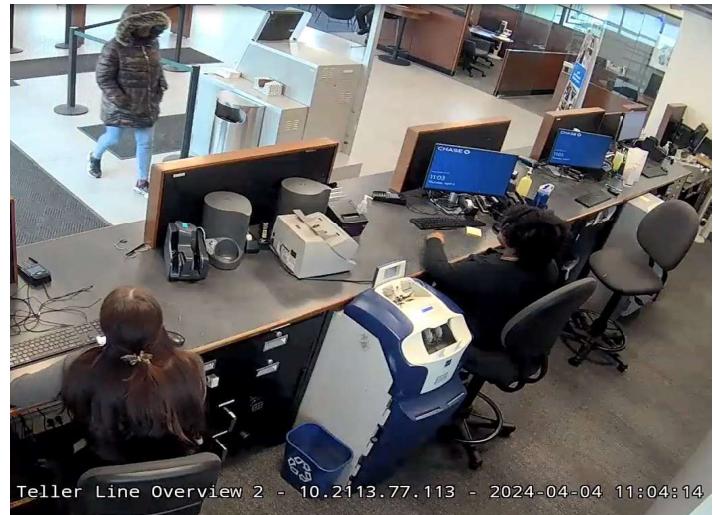
11. According to Teller A and video surveillance footage, the woman left the bank at approximately 11:05 a.m.

12. According to Teller A, Teller A informed Teller B (another employee at the Chase Bank) that the bank had been robbed. Teller B then informed other bank employees, including Bank Manager A, that the bank had been robbed. Teller A also informed Security Guard A that the bank had been robbed.

13. Both Teller A and Security Guard A observed the woman get into a blue truck and drive away. Security Guard A took pictures of the truck using her phone. One of those pictures is reproduced below. The truck does not bear a license plate on the front.



14. As a part of this investigation, I reviewed video surveillance at the Chase Bank from the date and time of the robbery. The footage depicts an individual who appears to be a black female, who was wearing a camouflage-patterned jacket with a fur-hood, blue jeans, black and white sneakers, and glasses, entering the bank at approximately 11:04 a.m. and leaving the bank at approximately 11:05 a.m. Some still images from the surveillance footage have been reproduced below:





15. Based on a comparison of the video surveillance footage and photograph images of GLORIA KILGORE, which appear below at Paragraphs 26, 29, and 30, KILGORE's appearance is consistent with that of the bank robber.

16. According to Teller B, Teller B called 911 as the robber exited the Chase Bank. Teller B, who could see the robber driving away from the Chase Bank, reported that the Chase Bank had been robbed and that the offender had driven away in a small blue truck. Meanwhile, Teller A took pictures of the rear of the truck, using her phone. One of those pictures is reproduced below. Although the photograph does not allow visual confirmation of the license plate number, it does depict several distinguishing features of the truck, including a covered truck bed, a trailer hitch, and a white emblem above the tailgate.



17. An audit of the Chase Bank determined that Teller A had provided the bank robber with approximately \$4,686 in cash.

18. According to information available from the Federal Deposit Insurance Corporation, Chase Bank's deposits were insured by the Federal Deposit Insurance Corporation at the time of the bank robbery.

**b. Tracking and Seizure of Suspect Vehicle, and arrest of KILGORE.**

19. According to Lansing Police Department ("LPD") Detective Dennis Murrin, at approximately 11:05 a.m., LPD officers at or near 170th Street and Torrence Avenue (approximately two blocks south of the Chase Bank) responded to radio dispatch reporting that the Chase Bank had been robbed and that the offender left using a blue truck. Shortly thereafter, LPD Officers observed a blue Chevrolet S10 travelling south on Torrence Avenue (the "Suspect Vehicle"). LPD Officers turned

on their police lights and attempted a traffic stop, but the vehicle did not comply. At this time, LPD Officers made note of the Suspect Vehicle's license plate (Indiana plate TK742NNF).<sup>1</sup> A brief chase ensued, and the Suspect Vehicle got onto Interstate-80 travelling eastbound. At this time, LPD lost visual of the Suspect Vehicle.

20. According to Detective Murrin, shortly thereafter, LPD communicated to surrounding agencies via radio dispatch that the Suspect Vehicle may have been used in a bank robbery. LPD also entered the Suspect Vehicle's license plate into a system that would cause automated license plate readers in the surrounding area to capture the Suspect Vehicle's license plate.

21. According to Lake County Sheriff's Department (LCSD) Detective Ben Lopez, at approximately 11:15 a.m. An automated license plate reader captured the Suspect Vehicle traveling on Burr Street over Interstate-80 in Gary, Indiana. At this time, Detective Lopez was at or near the intersection of Pierce Street and West 11th Avenue in Gary, Indiana.

22. According to Detective Lopez, Detective Lopez reviewed records available from the Indiana Secretary of State, which showed that the Suspect Vehicle was registered to Individual A at 1117 West 11th Avenue, in Gary, Indiana. ("Suspect Residence").

23. According to Detective Lopez, a few minutes after 11:15 a.m., Detective Lopez observed a blue Chevrolet S10 travelling northbound on Pierce Street in Gary,

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<sup>1</sup> As described in Paragraphs 33-34 below, the FBI eventually seized and photographed the Suspect Vehicle. Based on similar distinctive characteristics and my training and experience, I believe that the Suspect Vehicle is the same vehicle used in the robbery of the Chase Bank.

Indiana. Detective Lopez observed the vehicle's license plate, and confirmed that it was a match to that of the Suspect Vehicle. Detective Lopez activated his body worn camera ("BWC") during his pursuit. Detective Lopez followed the Suspect Vehicle, which turned onto West 11th Avenue. According to BWC footage, the Suspect Vehicle stopped in the street in front of the Suspect Residence at approximately 11:27 a.m.

24. According to Detective Lopez and BWC footage, Detective Lopez arrived at the Suspect Residence almost simultaneously and turned on his police lights. A lone black woman, later identified as GLORIA KILGORE, wearing a black and camouflage-patterned jacket with a fur hood, glasses, blue jeans, and black and white sneakers, exited the Suspect Vehicle.

25. According to Detective Lopez, Detective Lopez read the woman her *Miranda* rights and took her into custody at approximately 11:27 a.m. The woman had no items on her person. According to BWC footage, after Detective Lopez placed the woman under arrest, the woman said "shoot me."<sup>2</sup> A few minutes thereafter, the woman told Detective Lopez that her name was GLORIA KILGORE, and that her date of birth was October 8, 1959.

26. A still image from BWC footage depicting KILGORE moments before her April 4 arrest is reproduced below, alongside video surveillance footage depicting the Chase Bank's robber and her clothing for comparison.

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<sup>2</sup> In my affidavit submitted on April 10 in support of an application for a warrant to search the Suspect Vehicle, I deposed that, according to Detective Lopez, KILGORE said words to the effect of "just kill me now," as she was exiting the Suspect Vehicle. At that time, I had not reviewed BWC footage in connection with this investigation.



27. As shown in the April 4 BWC footage, KILGORE was wearing blue jeans, sneakers, socks, and a striped sweater, consistent with what was worn by the Chase Bank's robber earlier that day.

28. According to LCSD and BWC footage, KILGORE was wearing a black, hooded jacket with camouflaged lining at the time of her arrest. LCSD seized her jacket and took it into evidence. I retrieved a photograph of the jacket, which is reproduced below. The seized jacket is consistent with one that could have been worn reversibly by the bank robber (i.e. one side of the jacket is black, and one side is camouflage). A photograph of her jacket is also reproduced below for comparison.



29. KILGORE's appearance also closely matches the Chase Bank robber's. BWC footage depicting KILGORE's face is reproduced alongside surveillance footage depicting the Chase Bank robber's face for comparison.



30. According to Detective Lopez, using KILGORE's name and date of birth, he retrieved a photograph on file with the Indiana Bureau of Motor Vehicles. That photograph is reproduced below. GLORIA KILGORE's appearance matches that of the woman arrested on April 4, 2024 after exiting the Suspect Vehicle.



31. According to Detective Lopez, he looked into the Suspect Vehicle. He did not see Handbag 1 in plain view but did see a larger yellow purse ("Handbag 2") in the front passenger seat. According to Detective Lopez, Handbag 2 appeared "full."

32. According to Detective Lopez, later in the afternoon on April 4, 2024, LCSD towed the Suspect Vehicle and brought it to LPD headquarters located at 2710 170th Street in Lansing, Illinois.

33. Later on April 4, 2024, I, along with other members of the FBI, transported the Suspect Vehicle to FBI Chicago headquarters at 2111 West Roosevelt Road. The Suspect Vehicle has remained in a secure area at FBI Headquarters since April 4. On April 4, 2024, and April 5, 2024, FBI took photographs of the Suspect

Vehicle, its license plate, its VIN number (1GCCS19W028112072), and Handbag 2.

Some of those photographs are reproduced below.



34. Based upon FBI's inspection of the Suspect Vehicle, I believe the Suspect Vehicle was used during the April 4, 2024 robbery of the Chase Bank. The Suspect Vehicle bears several similarities to the truck used during the robbery, including the color, the absence of a front license plate, the visual appearance of the rear license plate, a covered truck bed, a trailer hitch, and a white emblem above the tailgate. For comparison, the photo depicting the rear of the Suspect Vehicle is reproduced alongside the photograph referenced in Paragraph 16 above.



**35.** According to Detective Murrin, on the evening of April 4, 2024, LPD arrived at LCSD headquarters to interview KILGORE. LPD officers read KILGORE her *Miranda* rights and conducted an interview which was recorded. KILGORE did not make a statement. According to the LPD, on or about April 6, KILGORE was released from LCSD custody without charges. According to FBI, on or about April 5, Individual A attempted to retrieve items from the Suspect Vehicle but was denied by FBI. On or about April 8, KILGORE attempted to retrieve the Suspect Vehicle but was denied by FBI.

**36.** On April 10, 2024, a United States Magistrate Judge approved an application for a warrant to search the Suspect Vehicle. FBI is preparing to execute the search warrant on April 12, 2024.

## II. CONCLUSION

37. Based on the foregoing facts, I respectfully submit that there is probable cause to believe that, on or about April 4, 2024, at Lansing, in the Northern District of Illinois, Eastern Division, GLORIA KILGORE, by intimidation, did take from the person or presence of a bank employee, United States currency belonging to and in the care, custody, control, management, and possession of Chase bank at 16767 Torrence Avenue in Lansing, Illinois, the deposits of which were insured by the Federal Deposit Corporation, in violation of Title 18, United States Code, Section 2113(a).

FURTHER AFFIANT SAYETH NOT.



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David Fitzpatrick  
Special Agent  
Federal Bureau of Investigation

Sworn to and affirmed by telephone 11th day of April, 2024



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Honorable BETH W. JANTZ  
United States Magistrate Judge